

EXHIBIT 2

***REDACTED VERSION OF
DOCUMENT SOUGHT TO
BE SEALED***

EXHIBIT 2

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

Case No.

UBER TECHNOLOGIES, INC.; 3:17-cv-00939-WHA

OTTOMOTTO LLC; OTTO TRUCKING,

INC.,

Defendants.

-----/

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF CHELSEA BAILEY

PALO ALTO, CALIFORNIA

TUESDAY, AUGUST 1, 2017

BY: ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~

CSR LICENSE NO. 9830

JOB NO. 2668970

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_____/

Videotaped Deposition of Chelsea Bailey,
taken on behalf of the Defendants, on August 1,
2017, at Morrison & Foerster, 950 Page Mill Road,
Palo Alto, California, beginning 9:01 a.m., and
commencing at 6:52 p.m., Pursuant to Notice, and
before me, ANDREA M. IGNACIO, CSR, RPR, CRR, CLR ~
License No. 9830.

1 including [REDACTED] [REDACTED]
[REDACTED] [REDACTED]; correct? 15:09
3 A That's what he shared, yes. 15:09
4 Q Did Mr. Levandowski say anything else about 15:09
5 [REDACTED] [REDACTED]
[REDACTED] [REDACTED] 15:09
7 A No. 15:09
8 Q Did you ask him? 15:09
9 A No. 15:09
10 Q Did you understand it to be [REDACTED]? 15:09
11 A I didn't. I didn't even consider it. I 15:09
12 think my main takeaways was that he -- he wasn't 15:09
13 decided, and he was just sort of thinking out loud 15:09
14 about the potential things he might do. 15:09
15 Q And the next bullet down is: 15:10
16 "Possibly starting his own thing, 15:10
17 self-driving semi trucks." 15:10
18 A That's what he shared, yeah. 15:10
19 Q Did he say anything else on that point? 15:10
20 A No. 15:10
21 Q Did you ask him? 15:10
22 A No. 15:10
23 Q The next header down is labeled: 15:10
24 "Who He's Taking." 15:10
25 And the first bullet there is: 15:10

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